November 10, 1999

Mr. Joseph S. Arena
Project Coordinator
U. S. Environmental Protection Agency
1650 Arch Street, Mail Code 3HW32
Philadelphia, Pennsylvania 19103-2029

Re: Response to U. S. Army Corps of Engineers Comments
GatherCo Sale Facilities-Volume #1
Active Screening Assessment Reports (ASARs)

Dear Mr. Arena:

Enclosed for your review and approval please find Columbia Gas Transmission Corporation's response to the USACE comments on the referenced reports. Many of the comments are redundant themes that are addressed globally. The most common of those is the recommendation to "…complete the latitude and longitude…" Please note that this comment is in response to the characters that delimit degrees, minutes and seconds in the report. As you know, the reports are generated from a central database and, due to a font translation error, the standard symbols for degrees, minutes and seconds were changed to (?), (‘), and (“), respectively. The data presented are correct, only the symbols are wrong. These symbols are corrected in the revised report. Where no latitude or longitude are given, this information either couldn't be acquired onsite or was corrupted during data collection/reporting, and Columbia will not re-collect this data at these sites which do not require further action.

Another recurring comment is the recommendation to "explain the U&J qualifiers." A list of acronyms has been added to this deliverable.

The reviewer noted several times that the detection limits for some PAHs were not below the action levels for some compounds. Please note that the Project Required Reporting Limits (PRRLs) and analytical methods from the US EPA approved QAPP were used for completion of this work. For PAHs in soil, the PRRLs were approved at 330 ppb. In some cases, constituents are predicted to pose a potential risk to selected populations at very low concentrations. Quite often, risk based levels are below readily achievable method detection limits, such as the case for benzo(a)pyrene or dibenzo(a,h)anthracene in soils. Furthermore, detection limits can change with the sample due to matrix interference effects and correction of the analytical results for moisture content.

Lastly, the reviewers noted a number of facilities which are missing Facility Condition Survey Forms, Liquid Removal Point Questionnaires, sketches, or photographs. This information was lost or corrupted during the data collection/management process and is unavailable at this time. Columbia has reviewed each of the facilities for which a comment was made regarding missing information and believes that the data included for each facility is sufficient for the EPA to evaluate.

The following comments are addressed specifically:

Page 1646
Annotation 1; Label: Robert Miller; Date: 08/05/1999 2:47:43 PM
Recommend sampling oil stained area.

Response:
Review of the site sketch, questionnaires, and photographs indicate that the stained soil is not associated with the drip.

Page 3189
Annotation 1; Label: Robert Miller; Date: 08/07/1999 11:31:31 AM
Recommend sampling stained area for PAHs.

Response:
A sampling team revisited this facility to assess the area in question. No staining was observed near the liquid removal point. Site photographs were taken and added to this report. The Facility Conditions Survey and Liquid Removal Point Questionnaire have been modified to indicate no staining present at this facility. No PAH samples were collected.

Page 3464
Annotation 1; Label: Robert Miller; Date: 08/08/1999 7:37:11 AM
Recommend marking the stressed areas and collecting a sample from this area.

Response:
A sampling team revisited this facility to assess the area in question. No staining was observed near the liquid removal point. Site photographs were taken and added to this report. The Facility Conditions Survey and Liquid Removal Point Questionnaire have been modified to indicate no staining present at this facility. No PAH samples were collected.

Page 3777
Annotation 1; Label: Robert Miller; Date: 08/08/1999 8:28:46 AM
Recommend marking the stained areas on the drawing and collecting samples from the stained areas if it has not previously been sampled.

Response:
The stained area was covered by sample numbers SS002 and SS003. The sketch will not be corrected since all of the PAHs are non-detect for analysis.

Page 3834
Annotation 1; Label: JOE ARENA; Date: 06/28/1999 3:10:41 PM
The facility conditions survey indicates that there was soil staining and stressed vegetation. Explain the difference.

Response:
The liquid removal point survey has been changed to reflect that both staining and stressed vegetation exist at the site.

Page 3973
Annotation 1; Label: JOE ARENA; Date: 06/28/1999 3:30:16 PM
Facility survey indicated soil staining. Explain the difference.

Response:
Review of the photographs does not show evidence of staining. Therefore, the answer to question 23 of the facility conditions survey has been changed to "no".

Page 4981, Page 5010
Annotation 1; Label: JOE ARENA; Date: 06/29/1999 8:10:50 AM
This point is on a backfed system. Why wasn't it tested for PCBs?

Response:
There was some confusion in the field regarding whether or not to sample backfed facilities in a case where adjacent facilities were listed as not backfed, and consequently samples were not collected for PCBs. Review of the information collected at the sites indicates no staining and no detections for BTEX. Additionally, with over 3600 PCB samples collected, only 21 samples were found with concentrations greater than 1 ppm (0.5 percent). Therefore, it is Columbia's position that PCBs are unlikely to be found and proposes no further action at these sites.

We trust these responses adequately address your comments and respectfully request that the sites included in the GatherCo ASARs-Volume #1 report bundle be removed from the Work Scope List. Please feel free to contact me should you have any questions or wish to discuss this further.

Very truly yours,

Walter C. Showen, III
Remediation Project Manager

Cc: Mr. Ed Yakuchev (USACE)
Mr. Ray Beaumier (OHEPA)

WCS:dl